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*Co-Lead Counsel for Plaintiffs and the
Proposed Class*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

IN RE EXPERIAN DATA
BREACH LITIGATION

Case No. 8:15-cv-01592 AG (DFMx)

Hon. Andrew J. Guilford

**JOINT STIPULATION REGARDING
PLAINTIFFS' MOTION TO
COMPEL**

Date: March 6, 2017

Time: 9:00 a.m.

Courtroom: 10D

STIPULATION

WHEREAS, Plaintiffs and Defendants Experian Holdings, Inc. and Experian Information Solutions, Inc. (“Experian” or “Defendants”) (collectively “the Parties”), having met and conferred, hereby provide this Joint Stipulation Regarding Plaintiffs’ Motion to Compel the Production of Defendants’ Undisclosed Expert’s Report and Related Documents;

WHEREAS, on March 31, 2016, the Court ordered that Defendants produce a privilege log regarding their asserted privileges regarding the Undisclosed Expert’s Report and Related Documents;

WHEREAS, Defendants served their privilege log on April 8, 2016, and served a supplemental privilege log on June 10, 2016;

WHEREAS, on February 9, 2017, Plaintiffs took a Federal Rules of Civil Procedure 30(b)6 deposition related to Defendants’ assertion of privilege on the Undisclosed Expert’s Report and Related Documents;

WHEREAS, the Parties have completed the required conference of counsel pursuant to L.R. 7-3, which took place at various dates between approximately May 2016 and February 2017;

WHEREAS, the Parties agree that the applicable meet and confer guidelines and briefing standards should be governed by L.R. 7-3 and not L.R. 37-1;

WHEREAS, the Parties have met and conferred about a briefing schedule and jointly agree that Plaintiffs’ Motion to Compel will be filed by March 24, 2017, Defendants’ Opposition will be due April 21, 2017, Plaintiffs’ Reply will be due May 3, 2017, and the Hearing on Plaintiffs’ Motion to Compel will be May 15, 2017, or at a date the Court is available;

WHEREAS, since the Parties now agree on the briefing schedule for Plaintiffs’ Motion to Compel, they no longer need guidance from the Court on these issues and request that the Court vacate the previously set March 6, 2017 Status

1 Conference;

2 THEREFORE, THE PARTIES HEREBY STIPULATE, through their
3 respective counsel of record that:

4 1. The Parties have completed the required conference of counsel
5 pursuant to L.R. 7-3, which took place at various dates between approximately May
6 2016 and February 2017;

7 2. The following briefing schedule will apply to Plaintiffs' Motion to
8 Compel, in accordance with Local Rule 7-4 *et seq.*: Plaintiffs' Motion to Compel
9 will be filed by March 24, 2017, Defendants' Opposition will be due April 21,
10 2017, Plaintiffs' Reply will be due May 3, 2017, and the Hearing on Plaintiffs'
11 Motion to Compel will be May 15, 2017, or at a date the Court is available;

12 3. The Status Conference set for March 6, 2017 may be continued to May
13 15, 2017, or at a date the Court is available; and

14 4. The Parties agree the concurrently filed [Proposed] Order is
15 acceptable.

16
17 Dated: March 2, 2017

JONES DAY

18 By: /s/ Richard J. Grabowski

19 Richard J. Grabowski
20 Attorneys for Defendants
21 EXPERIAN HOLDINGS, INC. and
22 EXPERIAN INFORMATION
SOLUTIONS, INC.

23 Dated: March 2, 2017

ROBINSON CALCAGNIE, INC.

24 By: /s/ Daniel S. Robinson

25 Daniel S. Robinson
26 Interim Co-Lead Counsel for the Class
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ATTESTATION OF FILER

Pursuant to Local Rule 5-4.4.3, the undersigned filer hereby attests that all signatories listed, and on whose behalves the filing is submitted, concur in the filing's content and have authorized filing.

Dated: March 2, 2017

By: /s/ Daniel S. Robinson

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2017, I caused to be filed the foregoing
JOINT STIPULATION RE PLAINTIFFS' MOTION TO COMPEL. This
document is being filed electronically using the Court's electronic case filing (ECF)
system, which will automatically send a notice of electronic filing to the email
addresses of all counsel of record.

Dated: March 2, 2017

By: /s/ Daniel S. Robinson